

November 1, 2018

Re: UMB Bank, N.A., as Trustee v. Sanofi, Case No. 1:15-cv-08725-GBD

Dear Judge Lehrburger:

We write jointly on behalf of Plaintiff UMB Bank, N.A., as Trustee (“the Trustee”) and Defendant Sanofi, pursuant to the Fifth Amended Discovery Plan and Scheduling Order (ECF No. 215) requiring the parties to submit a status report to Your Honor every 45 days.

I. Pending Motions

There are no pending motions.

II. Fact Discovery

A. Document Production

The Trustee has completed its production of documents responsive to Sanofi’s requests.

Sanofi has completed its production of documents responsive to the Trustee’s requests.

The parties reserve their rights to challenge the completeness of each other’s document production based on ongoing deposition testimony.

B. Depositions

Depositions are ongoing.

The parties continue to confer concerning Rule 30(b)(6) representatives and topics, and, with respect to Sanofi, the designation of prior deposition testimony in connection therewith.

C. Subpoenas

The Trustee has issued subpoenas for documents of third parties who provided services to Sanofi, including Simon Kucher & Partners, Parexel, Accenture LLP, ZS Associates, United Biosource Corporation, Moody’s Corporation, and Duff & Phelps Corporation. Production of documents responsive to these third-party subpoenas is ongoing, and the Trustee is engaged in meet and confers with the subpoenaed parties as to the completeness of these productions.

Sanofi has issued subpoenas for documents of third party CVR holders Stonehill Master Fund Limited and Stonehill Institutional Partners, L.P.

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D. Interrogatories and Requests for Admission

Pursuant to Paragraph II.a.1. of the Fifth Amended Discovery Plan and Scheduling Order, on October 30, 2018 the parties served Interrogatories and Requests for Admission on each other.

III. Next Joint Status Letter

The parties will submit their next joint status letter on Monday, December 17, 2018.

Respectfully submitted,

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